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Subject: Comments on sturgeon FSP
Date: 11/08/2006 02:07 PM
Attachments: [Robert.Neely.vcf](#)

Hey Chip and Eric,

Here are NOAA's comments on the sturgeon FSP. We appreciate the opportunity to provide input.

Size range -- LWG proposes to collect only pre-breeding sturgeon in the 42-50 inch range, arguing that fish in the 50-60 inch catchable range may, in some instances, be sexually mature. Based on information from ODFW/Tim Dalton, males do not mature until at least 60 inches and females not until at least 72 inches. Hence, NOAA suggests RETAINING captured fish in the 50-60 inch range to help ensure 1) we get sufficient numbers of fish and 2) we hold open the opportunity to get fish across a broader size range distribution.

PAHs, metals -- Because fish are known to bioregulate many compounds/elements in these contaminant classes, tissue analysis may not provide an accurate assessment of the extent to which sturgeon may be exposed to PAHs and metals. Hence, NOAA supports the suggestions from USFWS, Oregon DEQ, and others to analyze the stomach contents of caught sturgeon for these contaminant classes to determine concentrations in sturgeon prey.

Whole body vs. targeted multiple tissue analysis -- Though NOAA recognizes that it may be challenging to catch the 15 fish needed for whole body tissue analysis, we also believe there may be benefits to natural resource damage assessment from analyzing specific sturgeon tissues (organ, filet, etc.). Though NOAA does not expect EPA to direct LWG to conduct these analyses under the RI, we do request that if additional catchable fish (i.e., more than 15) are captured, that these (or some number therein) be retained for possible future targeted tissue analysis on the part of natural resource trustees, the NRRG, or other entities.

Spatial distribution -- LWG proposes to capture 3 fish each from 5 segments identified within the sampling area. If fishing is such that this is possible, NOAA believes it is a good approach. However, NOAA emphasizes that it may be difficult to get the fish needed across the whole site, much less 3 from each of 5 segments. Hence, NOAA recommends that, in the event the proposed number of fish cannot be captured from a given segment, field crews take advantage of fishing opportunities elsewhere in the sampling area to ensure a minimum of 15 fish are captured. In short, NOAA emphasizes the need for flexibility and opportunistic fishing in the event that success is spatially sporadic.

Thanks,

Rob